

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	
Desiree M. Kakos	:	Chapter 13
Evangelos G. Kakos	:	No.: 21-10217-AMC
Debtor(s)	:	

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RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC  
STAY FILED BY TOWER FEDERAL CREDIT UNION

Debtor, Desiree and Evangelos Kakos, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Tower Federal Credit Union hereby submits the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted payments were missed. Debtors ask for the chance to cure the arrears through an Amended Chapter 13 Plan.
7. Admitted.
8. No objection.
9. Admitted payments were missed. Debtors ask for the chance to cure the arrears through an Amended Chapter 13 Plan.
10. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: June 15, 2021

/s/ Brad J. Sadek, Esq.

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Brad J. Sadek, Esq.  
Attorney for the Debtor  
Sadek & Cooper  
1315 Walnut Street, #502  
Philadelphia, PA 19107  
(215) 545-0008

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CERTIFICATE OF SERVICE

I Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

**William C. Miller, Esq.**  
Chapter 13 Trustee

**Douglas R. Blecki, Jr.**  
Electronic Notice  
Attorney for Movant

Dated: June 15, 2021

/s/Brad J. Sadek, Esq  
Brad J. Sadek, Esq.  
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